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May 26, 2025

The Honorable Leonard P. Stark
United States District Court
District of Delaware
J. Caleb Boggs Federal Building
844 N. King Street
Wilmington, Delaware 19801

Re: *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, No. 17 Misc. 151

Dear Judge Stark:

We represent Red Tree Investments, LLC (“Red Tree”). We write to propose the below expedited briefing schedule for Red Tree Investments, LLC’s Motion for and Order Entering a Discovery Schedule filed on May 23, 2025, D.I. 1756 (the “Motion”).¹

- Oppositions due Wednesday, May 28, 2025
- Reply due Friday, May 30, 2025; and
- Oral argument, if any, at the convenience of the Court.

Red Tree respectfully submits that setting a discovery schedule now will further the Court’s directive to maintain an orderly and efficient process leading up to the July 22 Sale Hearing, minimize potential foreseeable discovery disputes, and provide clarity regarding expert discovery.

Red Tree informed the Special Master, Sale Process Parties, and Additional Judgment Creditors of its intent to request this briefing schedule on May 23 but has not received a response from any party.

¹ Red Tree understands that the Venezuela Parties have filed the Motion for an Extension of the Topping Period, D.I. 1757, which Red Tree opposes, D.I. 1762. If the Court extends the topping period, Red Tree may propose an alternative discovery schedule than that proposed in the Motion.

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We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Rebecca L. Butcher

Rebecca L. Butcher (No. 3816)

RLB/lmr

cc: All counsel of record (*via* ECF)